

EXHIBIT A



TO: Law Dept. Service of Process
Georgia-Pacific LLC
133 Peachtree St. NE, 42nd Floor
Atlanta, GA 30303

RE: **Process Served in Illinois**

FOR: Georgia-Pacific Corrugated IV LLC (Domestic State: DE)

**Service of Process
Transmittal**
07/30/2021
CT Log Number 539999201

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: WILLIAM RIVERA, PLTF. vs. GEORGIA-PACIFIC, LLC., ET AL., DFTS. // TO:
Georgia-Pacific Corrugated IV, LLC
Name discrepancy noted.

DOCUMENT(S) SERVED: --

COURT/AGENCY: None Specified
Case # 2021L007670

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

ON WHOM PROCESS WAS SERVED: C T Corporation System, Chicago, IL

DATE AND HOUR OF SERVICE: By Process Server on 07/30/2021 at 03:45

JURISDICTION SERVED : Illinois

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 07/30/2021, Expected Purge Date:
08/04/2021

Image SOP

Email Notification, Law Dept. Service of Process gplawsop@gapac.com

REGISTERED AGENT ADDRESS: C T Corporation System
208 South LaSalle Street
Suite 814
Chicago, IL 60604
877-564-7529
MajorAccountTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

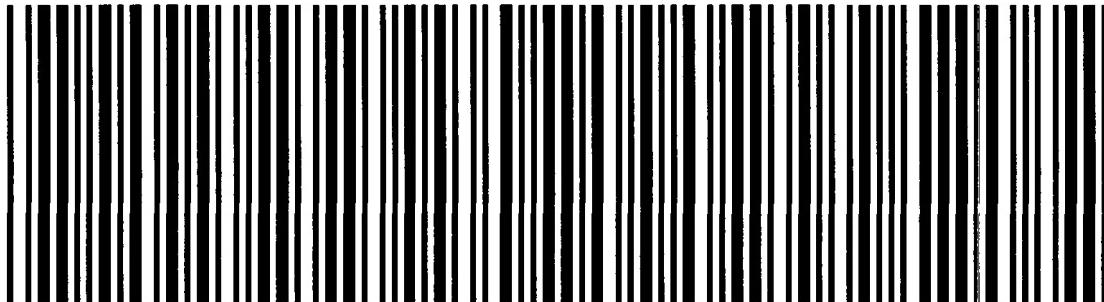


PROCESS SERVER DELIVERY DETAILS

Date: Fri, Jul 30, 2021

Server Name: Todd Martinson

Entity Served	GEORGIA-PACIFIC CORRUGATED IV LLC
Case Number	2021 L 007670
Jurisdiction	IL



FILED
7/29/2021 4:01 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L007670

2120 - Served

2121 - Served

2220 - Not Served

2221 - Not Served

2320 - Served By Mail

2321 - Served By Mail

2420 - Served By Publication

2421 - Served By Publication

Summons - Alias Summons

(08/01/18) CCG 0001 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

WILLIAM RIVERA,

(Name all parties)

v.

GEORGIA-PACIFIC, LLC, ET AL.,

Georgia-Pacific Corrugated IV, LLC
R/A: C T Corporation System
208 S. La Salle Street, Suite 814
Chicago, IL 60604

Case No.

SUMMONS ALIAS SUMMONS

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please [visit www.cookcountyclerkofcourt.org](http://www.cookcountyclerkofcourt.org) to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

If you fail to do so, a judgment by default may be entered against you for the relief requested in the complaint.

To the Officer:

This Summons must be returned by the officer or other person to whom it was given for service, with endorsement of service and fees, if any, immediately after service. If service cannot be made, this Summons shall be returned so endorsed. This Summons may not be served later than thirty (30) days after its date.

Summons - Alias Summons**(08/01/18) CCG 0001 B**

E-filing is now mandatory for documents in civil cases with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/FAQ/gethelp.asp>, or talk with your local circuit clerk's office.

Atty. No.: 32692

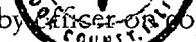
Witness: _____

Atty Name: DAVID KOCH

7/29/2021 4:01 PM IRIS Y. MARTINEZ

Atty. for: PLAINTIFFDOROTHY  Clerk of CourtAddress: 5947 W. 35TH STREET

7-30-21

City: CICERODate of Service:
(To be inserted by  Officer or copy left with
Defendant or other person):State: IL Zip: 60804Telephone: 708-656-9900Primary Email: davidg@dkoffices.com

CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- Richard J Daley Center
50 W Washington
Chicago, IL 60602
District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
- District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
- District 4 - Maywood
1500 Maybrook Ave
Maywood, IL 60153
- District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
- District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
- Domestic Violence Court
555 W Harrison
Chicago, IL 60607
- Juvenile Center Building
2245 W Ogden Ave, Rm 13
Chicago, IL 60602
- Criminal Court Building
2650 S California Ave, Rm 526
Chicago, IL 60608
- Domestic Relations Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Civil Appeals
Richard J Daley Center
50 W Washington, Rm 801
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Criminal Department
Richard J Daley Center
50 W Washington, Rm 1006
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- County Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Probate Division
Richard J Daley Center
50 W Washington, Rm 1202
Chicago, IL 60602
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Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

Daley Center Divisions/Departments

- Civil Division
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50 W Washington, Rm 601
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm
- Chancery Division
Richard J Daley Center
50 W Washington, Rm 802
Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED
7/29/2021 4:01 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L007670

WILLIAM RIVERA,)
)
)
Plaintiff,)
)
)
v.) Case No.
)
)
GEORGIA-PACIFIC, LLC., GEORGIA-PACIFIC)
CORRUGATED IV, LLC., KOCH INDUSTRIES)
INC.,)
)
Defendants.)

COMPLAINT

NOW COMES, the Plaintiff, William Rivera, by and through his attorneys, Koch & Associates, P.C. and complains of the Defendants, Georgia-Pacific, LLC., Georgia-Pacific Corrugated IV, LLC., and Koch Industries, Inc., as follows:

JURISDICTION AND VENUE

1. The court has jurisdiction in this matter pursuant to 735 ILCS 5/2-209(a)(2), since this action is premised on a tortious act that occurred in Cook County, State of Illinois.
2. Venue is proper in this court pursuant to 735 ILCS 5/2-101, since the action complained of herein occurred in Cook County, State of Illinois.

THE PARTIES

3. Upon information and belief, and at all times relevant to this action, the Plaintiff, William Rivera, is a resident of Cook County, State of Illinois.
4. Upon information and belief, and at all times relevant to this action, the Defendant, Georgia-Pacific, LLC., is a company doing business in the State of Illinois.
5. Upon information and belief, and at all times relevant to this action, the Defendant, Georgia-Pacific Corrugated IV, LLC., is a company doing business in the State of Illinois.

6. Upon information and belief, and at all times relevant to this action, the Defendant, Koch Industries, Inc., is a company doing business in the State of Illinois.

GENERAL ALLEGATIONS

7. At all times relevant to this action, the Plaintiff, William Rivera, was an employee, agent, and/or representative of the Defendant, Georgia-Pacific, LLC.

8. At all times relevant to this matter, the Defendant, Georgia-Pacific, LLC., is a paper and pulp manufacturing company.

9. At all times relevant to this matter, the Defendant, Koch Industries, Inc., is the owner of the Defendant, Georgia-Pacific, LLC.

10. On or about September 26, 2019, at or about 2 p.m., the Plaintiff, William Rivera, started his work shift for the Defendant, Georgia-Pacific, LLC., located at or near 905 Meridian Lake Drive, Aurora, IL 60504, (hereinafter, "the Premises").

11. At or about 4:00 p.m., the Plaintiff, William Rivera, while on the Premises and on-duty, was feeding rolls of paper into a machine, as he was instructed to do so by an employee, agent, and/or representative of the Defendant, Georgia-Pacific, LLC.

12. At the time and place aforesaid, the Plaintiff, William Rivera, suffered an injury to his right shoulder as he was feeding the rolls of paper into the machine.

13. At the time and place aforesaid, the Plaintiff, William Rivera, reported his injury to a supervisor for the Defendant, Georgia-Pacific, LLC.

COUNT I
NEGLIGENCE
WILLIAM RIVERA v. GEORGIA-PACIFIC, LLC.

14. The Plaintiff, William Rivera, incorporates and re-alleges paragraphs 1-13 of this compliant.

15. At all times relevant to this action, the Defendant, Georgia-Pacific, L.L.C., was under a duty to act reasonably in providing a safe work environment, free from any/all hazards, and to not cause injuries to the Plaintiff, William Rivera.

16. At the time and place aforesaid, the Defendant, Georgia-Pacific, L.L.C., breached its duty in one or more of the following ways:

- a. Directed Plaintiff to perform the work in an unsafe manner;
- b. Failed to provide/recommend Plaintiff with safety equipment;
- c. Failure to provide/recommend Plaintiff with necessary equipment;
- d. Failed to provide/recommend a reasonably safe work plan or protocols;
- e. Failed to provide a reasonably safe workplace;
- f. Failure to provide/recommend assistance to the Plaintiff as he fed the rolls of paper into the machine;
- g. Failure to supervise Plaintiff as he fed the rolls of paper into the machine;
- h. Was otherwise careless, reckless, and negligent in providing a safe workplace for Plaintiff.

17. That as a direct and proximate result of one or more of the aforementioned careless, reckless, and negligent acts and/or omissions by the Defendant, Georgia-Pacific, L.L.C., sustained bodily injuries and costs related to those injuries.

WHEREFORE, the Plaintiff, William Rivera, demands judgement against the Defendant, Georgia-Pacific, L.L.C., in a sum in excess of \$30,000.00, plus court costs, attorney fees, and any other relief this Honorable Court deems fair and just.

**COUNT II
NEGLIGENCE**

WILLIAM RIVERA v. GEORGIA-PACIFIC CORRUGATED IV, LLC.

18. The Plaintiff, William Rivera, incorporates and re-alleges paragraphs 1-13 of this compliant.

19. At all times relevant to this action, the Defendant, Georgia-Pacific Corrugated IV, L.L.C., was under a duty to act reasonably in providing a safe work environment, free from any/all hazards, and to not cause injuries to the Plaintiff, William Rivera.

20. At the time and place aforesaid, the Defendant, Georgia-Pacific Corrugated IV, L.L.C., breached its duty in one or more of the following ways:

- a. Directed Plaintiff to perform the work in an unsafe manner;
- b. Failed to provide/recommend Plaintiff with safety equipment;
- c. Failure to provide/recommend Plaintiff with necessary equipment;
- d. Failed to provide/recommend a reasonably safe work plan or protocols;
- e. Failed to provide a reasonably safe workplace;
- f. Failure to provide/recommend assistance to the Plaintiff as he fed the rolls of paper into the machine;
- g. Failure to supervise Plaintiff as he fed the rolls of paper into the machine;
- h. Was otherwise careless, reckless, and negligent in providing a safe workplace for Plaintiff.

21. That as a direct and proximate result of one or more of the aforementioned careless, reckless, and negligent acts and/or omissions by the Defendant, Georgia-Pacific Corrugated IV, L.L.C., sustained bodily injuries and costs related to those injuries.

WHEREFORE, the Plaintiff, William Rivera, demands judgement against the Defendant, Georgia-Pacific Corrugated IV, L.L.C., in a sum in excess of \$30,000.00, plus court costs, attorney fees, and any other relief this Honorable Court deems fair and just.

COUNT III
NEGLIGENCE
WILLIAM RIVERA v. KOCH INDUSTRIES, INC.

22. The Plaintiff, William Rivera, incorporates and re-alleges paragraphs 1-13 of this compliant.

23. At all times relevant to this action, the Defendant, Koch Industries, Inc., was under a duty to act reasonably in providing a safe work environment, free from any/all hazards, and to not cause injuries to the Plaintiff, William Rivera.

24. At the time and place aforesaid, the Defendant, Koch Industries, Inc., breached its duty in one or more of the following ways:

- a. Directed Plaintiff to perform the work in an unsafe manner;
- b. Failed to provide/recommend Plaintiff with safety equipment;
- c. Failure to provide/recommend Plaintiff with necessary equipment;
- d. Failed to provide/recommend a reasonably safe work plan or protocols;
- e. Failed to provide a reasonably safe workplace;
- f. Failure to provide/recommend assistance to the Plaintiff as he fed the rolls of paper into the machine;
- g. Failure to supervise Plaintiff as he fed the rolls of paper into the machine;
- h. Was otherwise careless, reckless, and negligent in providing a safe workplace for Plaintiff.

25. That as a direct and proximate result of one or more of the aforementioned careless, reckless, and negligent acts and/or omissions by the Defendant, Koch Industries, Inc., sustained bodily injuries and costs related to those injuries.

WHEREFORE, the Plaintiff, William Rivera, demands judgement against the Defendant, Koch Industries, Inc., in a sum in excess of \$30,000.00, plus court costs, attorney fees, and any other relief this Honorable Court deems fair and just.

Respectfully submitted,

By: /S/ David Koch
Attorney for Plaintiff

Koch & Associates, P.C.
Attorney for Plaintiff
5947 W. 35th Street
Cicero, IL 60804
Tel: (708) 656-9900
Fax: (866) 258-8351
Email: davidk@dkoffices.com
Atty. No. 32692



TO: Law Dept. Service of Process
Georgia-Pacific LLC
133 Peachtree St. NE, 42nd Floor
Atlanta, GA 30303

RE: **Process Served in Illinois**
FOR: Georgia-Pacific LLC (Domestic State: DE)

**Service of Process
Transmittal**
07/30/2021
CT Log Number 539999207

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	WILLIAM RIVERA, PLTF. vs. GEORGIA-PACIFIC, LLC., ET AL., DFTS. <i>Name discrepancy noted.</i>
DOCUMENT(S) SERVED:	--
COURT/AGENCY:	None Specified Case # 2021L007670
NATURE OF ACTION:	Employee Litigation - Personal Injury
ON WHOM PROCESS WAS SERVED:	C T Corporation System, Chicago, IL
DATE AND HOUR OF SERVICE:	By Process Server on 07/30/2021 at 03:45
JURISDICTION SERVED :	Illinois
APPEARANCE OR ANSWER DUE:	None Specified
ATTORNEY(S) / SENDER(S):	None Specified
ACTION ITEMS:	CT has retained the current log, Retain Date: 07/30/2021, Expected Purge Date: 08/04/2021 Image SOP Email Notification, Law Dept. Service of Process gplawsop@gapac.com
REGISTERED AGENT ADDRESS:	C T Corporation System 208 South LaSalle Street Suite 814 Chicago, IL 60604 877-564-7529 MajorAccountTeam2@wolterskluwer.com

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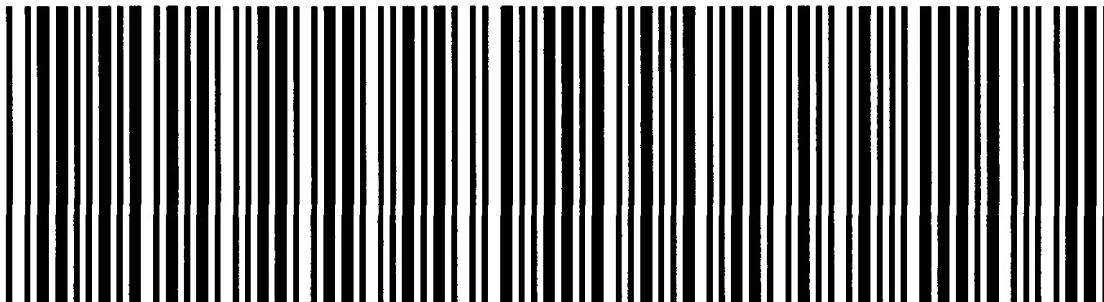


PROCESS SERVER DELIVERY DETAILS

Date: Fri, Jul 30, 2021

Server Name: Todd Martinson

Entity Served	GEORGIA-PACIFIC LLC
Case Number	2021 L 007670
Jurisdiction	IL



FILED
7/29/2021 4:01 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L007670

2120 - Served 2121 - Served
2220 - Not Served 2221 - Not Served
2320 - Served By Mail 2321 - Served By Mail
2420 - Served By Publication 2421 - Served By Publication
Summons - Alias Summons

(08/01/18) CCG 0001 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

WILLIAM RIVERA,

(Name all parties)

v.

GEORGIA-PACIFIC, LLC, ET AL.,

Georgia-Pacific, LLC
R/A: C T Corporation System
208 S. La Salle Street, Suite 814
Chicago, IL 60604

Case No. _____

SUMMONS **ALIAS SUMMONS**

To each Defendant:

YOU ARE SUMMONED and required to file an answer to the complaint in this case, a copy of which is hereto attached, or otherwise file your appearance and pay the required fee **within thirty (30) days after service of this Summons**, not counting the day of service. To file your answer or appearance you need access to the internet. Please visit www.cookcountyclerkofcourt.org to initiate this process. Kiosks with internet access are available at all Clerk's Office locations. Please refer to the last page of this document for location information.

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Summons - Alias Summons

(08/01/18) CCG 0001 B

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Atty. No.: 32692

Witness: _____

Atty Name: DAVID KOCH

7/29/2021 4:01 PM IRIS Y. MARTINEZ

Atty. for: PLAINTIFF

DOROTHY BROWN, Clerk of Court

Address: 5947 W. 35TH STREET

7-30-21

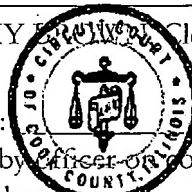
City: CICERO

Date of Service:
(To be inserted by officer or copy left with
Defendant or other person):

State: IL Zip: 60804

Telephone: 708-656-9900

Primary Email: davidg@dkoffices.com



CLERK OF THE CIRCUIT COURT OF COOK COUNTY OFFICE LOCATIONS

- Richard J Daley Center
50 W Washington
Chicago, IL 60602
District 2 - Skokie
5600 Old Orchard Rd
Skokie, IL 60077
 - District 3 - Rolling Meadows
2121 Euclid
Rolling Meadows, IL 60008
 - District 4 - Maywood
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Maywood, IL 60153
 - District 5 - Bridgeview
10220 S 76th Ave
Bridgeview, IL 60455
 - District 6 - Markham
16501 S Kedzie Pkwy
Markham, IL 60428
 - Domestic Violence Court
555 W Harrison
Chicago, IL 60607
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2245 W Ogden Ave, Rm 13
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 - Criminal Court Building
2650 S California Ave, Rm 526
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- Domestic Relations Division
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Chicago, IL 60602
Hours: 8:30 am - 4:30 pm

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

FILED
7/29/2021 4:01 PM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
2021L007670

WILLIAM RIVERA,)
)
)
Plaintiff,)
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v.) Case No.
)
)
GEORGIA-PACIFIC, LLC., GEORGIA-PACIFIC)
CORRUGATED IV, LLC., KOCH INDUSTRIES)
INC.,)
)
Defendants.)

COMPLAINT

NOW COMES, the Plaintiff, William Rivera, by and through his attorneys, Koch & Associates, P.C. and complains of the Defendants, Georgia-Pacific, LLC., Georgia-Pacific Corrugated IV, LLC., and Koch Industries, Inc., as follows:

JURISDICTION AND VENUE

1. The court has jurisdiction in this matter pursuant to 735 ILCS 5/2-209(a)(2), since this action is premised on a tortious act that occurred in Cook County, State of Illinois.
2. Venue is proper in this court pursuant to 735 ILCS 5/2-101, since the action complained of herein occurred in Cook County, State of Illinois.

THE PARTIES

3. Upon information and belief, and at all times relevant to this action, the Plaintiff, William Rivera, is a resident of Cook County, State of Illinois.
4. Upon information and belief, and at all times relevant to this action, the Defendant, Georgia-Pacific, LLC., is a company doing business in the State of Illinois.
5. Upon information and belief, and at all times relevant to this action, the Defendant, Georgia-Pacific Corrugated IV, LLC., is a company doing business in the State of Illinois.

6. Upon information and belief, and at all times relevant to this action, the Defendant, Koch Industries, Inc., is a company doing business in the State of Illinois.

GENERAL ALLEGATIONS

7. At all times relevant to this action, the Plaintiff, William Rivera, was an employee, agent, and/or representative of the Defendant, Georgia-Pacific, LLC.

8. At all times relevant to this matter, the Defendant, Georgia-Pacific, LLC., is a paper and pulp manufacturing company.

9. At all times relevant to this matter, the Defendant, Koch Industries, Inc., is the owner of the Defendant, Georgia-Pacific, LLC.

10. On or about September 26, 2019, at or about 2 p.m., the Plaintiff, William Rivera, started his work shift for the Defendant, Georgia-Pacific, LLC., located at or near 905 Meridian Lake Drive, Aurora, IL 60504, (hereinafter, "the Premises").

11. At or about 4:00 p.m., the Plaintiff, William Rivera, while on the Premises and on-duty, was feeding rolls of paper into a machine, as he was instructed to do so by an employee, agent, and/or representative of the Defendant, Georgia-Pacific, LLC.

12. At the time and place aforesaid, the Plaintiff, William Rivera, suffered an injury to his right shoulder as he was feeding the rolls of paper into the machine.

13. At the time and place aforesaid, the Plaintiff, William Rivera, reported his injury to a supervisor for the Defendant, Georgia-Pacific, LLC.

COUNT I
NEGLIGENCE
WILLIAM RIVERA v. GEORGIA-PACIFIC, LLC.

14. The Plaintiff, William Rivera, incorporates and re-alleges paragraphs 1-13 of this compliant.

15. At all times relevant to this action, the Defendant, Georgia-Pacific, L.L.C., was under a duty to act reasonably in providing a safe work environment, free from any/all hazards, and to not cause injuries to the Plaintiff, William Rivera.

16. At the time and place aforesaid, the Defendant, Georgia-Pacific, L.L.C., breached its duty in one or more of the following ways:

- a. Directed Plaintiff to perform the work in an unsafe manner;
- b. Failed to provide/recommend Plaintiff with safety equipment;
- c. Failure to provide/recommend Plaintiff with necessary equipment;
- d. Failed to provide/recommend a reasonably safe work plan or protocols;
- e. Failed to provide a reasonably safe workplace;
- f. Failure to provide/recommend assistance to the Plaintiff as he fed the rolls of paper into the machine;
- g. Failure to supervise Plaintiff as he fed the rolls of paper into the machine;
- h. Was otherwise careless, reckless, and negligent in providing a safe workplace for Plaintiff.

17. That as a direct and proximate result of one or more of the aforementioned careless, reckless, and negligent acts and/or omissions by the Defendant, Georgia-Pacific, L.L.C., sustained bodily injuries and costs related to those injuries.

WHEREFORE, the Plaintiff, William Rivera, demands judgement against the Defendant, Georgia-Pacific, L.L.C., in a sum in excess of \$30,000.00, plus court costs, attorney fees, and any other relief this Honorable Court deems fair and just.

COUNT II
NEGLIGENCE

WILLIAM RIVERA v. GEORGIA-PACIFIC CORRUGATED IV, LLC.

18. The Plaintiff, William Rivera, incorporates and re-alleges paragraphs 1-13 of this compliant.

19. At all times relevant to this action, the Defendant, Georgia-Pacific Corrugated IV, L.L.C., was under a duty to act reasonably in providing a safe work environment, free from any/all hazards, and to not cause injuries to the Plaintiff, William Rivera.

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- e. Failed to provide a reasonably safe workplace;
- f. Failure to provide/recommend assistance to the Plaintiff as he fed the rolls of paper into the machine;
- g. Failure to supervise Plaintiff as he fed the rolls of paper into the machine;
- h. Was otherwise careless, reckless, and negligent in providing a safe workplace for Plaintiff.

21. That as a direct and proximate result of one or more of the aforementioned careless, reckless, and negligent acts and/or omissions by the Defendant, Georgia-Pacific Corrugated IV, L.L.C., sustained bodily injuries and costs related to those injuries.

WHEREFORE, the Plaintiff, William Rivera, demands judgement against the Defendant, Georgia-Pacific Corrugated IV, L.L.C., in a sum in excess of \$30,000.00, plus court costs, attorney fees, and any other relief this Honorable Court deems fair and just.

COUNT III
NEGLIGENCE
WILLIAM RIVERA v. KOCH INDUSTRIES, INC.

22. The Plaintiff, William Rivera, incorporates and re-alleges paragraphs 1-13 of this compliant.

23. At all times relevant to this action, the Defendant, Koch Industries, Inc., was under a duty to act reasonably in providing a safe work environment, free from any/all hazards, and to not cause injuries to the Plaintiff, William Rivera.

24. At the time and place aforesaid, the Defendant, Koch Industries, Inc., breached its duty in one or more of the following ways:

- a. Directed Plaintiff to perform the work in an unsafe manner;
- b. Failed to provide/recommend Plaintiff with safety equipment;
- c. Failure to provide/recommend Plaintiff with necessary equipment;
- d. Failed to provide/recommend a reasonably safe work plan or protocols;
- e. Failed to provide a reasonably safe workplace;
- f. Failure to provide/recommend assistance to the Plaintiff as he fed the rolls of paper into the machine;
- g. Failure to supervise Plaintiff as he fed the rolls of paper into the machine;
- h. Was otherwise careless, reckless, and negligent in providing a safe workplace for Plaintiff.

25. That as a direct and proximate result of one or more of the aforementioned careless, reckless, and negligent acts and/or omissions by the Defendant, Koch Industries, Inc., sustained bodily injuries and costs related to those injuries.

WHEREFORE, the Plaintiff, William Rivera, demands judgement against the Defendant, Koch Industries, Inc., in a sum in excess of \$30,000.00, plus court costs, attorney fees, and any other relief this Honorable Court deems fair and just.

Respectfully submitted,

By: /S/ David Koch
Attorney for Plaintiff

Koch & Associates, P.C.
Attorney for Plaintiff
5947 W. 35th Street
Cicero, IL 60804
Tel: (708) 656-9900
Fax: (866) 258-8351
Email: davidk@dkoffices.com
Atty. No. 32692

EXHIBIT B

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

WILLIAM RIVERA,)
Plaintiff,) Case No. 2021-L-007670
v.)
GEORGIA-PACIFIC, LLC, GEORGIA PACIFIC)
CORRUGATED IV, LLC, KOCH INDUSTRIES)
INC.,)
Defendants.)

**DEFENDANTS GEORGIA-PACIFIC LLC AND GEORGIA-PACIFIC
CORRUGATED IV LLC'S NOTICE OF FILING NOTICE OF REMOVAL**

PLEASE TAKE NOTICE that Defendants Georgia-Pacific LLC and Georgia-Pacific Corrugated IV LLC, have filed a Notice of Removal of the above-captioned civil action, including all claims and causes of actions, to the United States District Court for the Northern District of Illinois, Eastern Division. The Notice of Removal was filed on August 27, 2021. A true and correct copy of the Notice of Removal is attached hereto as Exhibit "A."

The Circuit Court of Cook County shall not proceed further with this case unless and until it is remanded back to the Court by order of the United States District Court.

Dated: August 27, 2021

Respectfully submitted,

/s/ Kelly Koss
Kelly K. Koss
BARNES & THORNBURG LLP
One North Wacker Drive, Suite 4400
Chicago, IL 60606-2833
Telephone: (312) 214-8825
kelly.koss@btlaw.com
Firm No. 32715

**IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION**

WILLIAM RIVERA,)
)
Plaintiff,)
) Case No. 2021-L-007670
v.)
)
GEORGIA-PACIFIC, LLC, GEORGIA PACIFIC)
CORRUGATED IV, LLC, KOCH INDUSTRIES)
INC.,)
)
Defendants.)

NOTICE OF FILING

To: David Koch
Koch & Associates, P. C.
5947 W. 35th Street
Cicero, IL 60804
Tel: (708) 656-9900
Email: davidk@dkoffices.com

On August 27, 2021, we caused to be filed with the Clerk of the Circuit Court of Cook County **Defendants' Notice of Filing Notice of Removal**, a copy of which is hereby served upon you.

/s/ Kelly Koss
Kelly K. Koss
BARNES & THORNBURG LLP
One North Wacker Drive, Suite 4400
Chicago, IL 60606-2833
Telephone: (312) 214-8825
kelly.koss@btlaw.com
Firm No. 32715

PROOF OF SERVICE

I, Kelly Koss, the attorney, certify that I served this notice by efile and e-mailing a copy to above party at the e-mail address listed above, on August, 27, 2021.

/s/ Kelly Koss

EXHIBIT C

CLAIM INFORMATION

File/Claim Number: 3D44166081355XB
 Claim Adjuster: [KAREN ANDERSON](#)
 Claim Type: [COMP Compensation](#)
 Location/Site: 5941 AURORA (GP662445)

Claimant: RIVERA;WILLIAM
 Status: [Open](#)
 Gender: Male
 Plant Division: GP662445##

Event Date: 09/26/2019 14:00
 Close Date:
 Age: 64

Summary	Transactions	Contacts	Claim Notes	State Reporting	Documents	Client Notes/Docs	Legal	Disability Info	Sidebar
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Claim Summary

Description: LOADING BOXES WHEN THEY FELT DISCOMFORT IN THEIR UPPER ARM SPRAIN OR STRAIN OF THE NECK

Cause: G2 Bodily Reaction - Sudden Muscular Movements - From Voluntary Motions

Hazard: M3 Taking Unsafe Position or Posture - Unnecessary Exposure Under Suspended Loads

Damage/Injury: UG Sprains, Strains (Including Whip Lash) - Neck

Claim Totals - USD US DOLLAR

	Gross Reserve	Paid	O/S Reserves	Incurred	Recovery	Incurred Net of Rec
Indemnity		8,808.30				
Medical		52,288.78				
Expenses		5,412.61				
Total		66,504.70			0.00	